

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TENNESSEE

IN RE:

APPALACHIAN OIL COMPANY, INC.
Debtor

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* CASE NO. 2:09-bk-50259
* Chapter 11
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**RESPONSE TO MOTION OF PREMIUM FINANCING
SPECIALISTS, INC. FOR RELIEF FROM THE AUTOMATIC STAY OR,
ALTERNATIVELY, FOR ADEQUATE PROTECTION**

The Debtor, Appalachian Oil Company, Inc. (the "Debtor" or "APPCO"), in response to the Motion of Premium Financing Specialists, Inc. ("Premium Financing") for Relief From the Automatic Stay or, Alternatively, For Adequate Protection (the "Motion"), responds as follows.

The Debtor does not oppose the Motion as filed. However, the Debtor requests that Premium Financing seek to terminate the applicable policies, the premiums which were financed through financing arrangement at issue effective February 9, 2009, the date the Debtor's voluntary bankruptcy petition was filed, and seek any premium refund that may be available to Premium Financing and the Debtor upon such effective cancellation date. The Debtor will cooperate with efforts to cancel the policies retroactive to February 9, 2009.

HUNTER, SMITH & DAVIS, LLP

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 13, 2009 the **Response to Motion of Premium Financing Specialists, Inc. for Relief From the Automatic Stay or, Alternatively, For Adequate Protection** was filed electronically. The following parties will receive copies of this document. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties, if any, have been served by hand delivery, overnight delivery, facsimile transmission, or by mailing a copy of same by United States Mail, postage prepaid.

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/s/ Mark S. Dessauer
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DESSAUER: A-B: APPALACHIAN OIL
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